

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ERIC YONG WOO,

Defendant.

No. 1:19-CR-334

Hon. Leonie M. Brinkema

STATEMENT OF FACTS

The United States and the Defendant, ERIC YONG WOO (hereafter "WOO"), stipulate that the allegations in Count 3 of the superseding indictment and the following facts are true and correct, and that had the matter gone to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. From in and around at least 2016 and continuing through in and around October 2020, within the Eastern District of Virginia, and elsewhere, the defendant WOO, did knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown, to commit an offense against the United States, in violation 18 U.S.C. § 1956(a)(1)(B)(i), to wit: to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute cocaine, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the conspiracy, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(h).

2. On or about March 2, 2016, George Yu (Yu) agreed, on behalf of Xizhi Li (Li), to fly from Los Angeles to Chicago to pick up and transport approximately \$300,000 of drug proceeds owed to a foreign drug trafficking organization (DTO). WOO agreed to accompany Yu on this trip, knowing that the purpose was to obtain and transport bulk cash. Yu and WOO flew together from Los Angeles to Chicago. Once in Chicago, WOO rented a vehicle and drove with Yu to a parking lot in the greater Chicago area. Once at the parking lot, Yu retrieved the proceeds from an unknown person in a hand-to-hand transaction while WOO waited in the car. WOO and Yu then drove the drug proceeds back to Los Angeles in the rental vehicle. WOO was, at least, aware the money came from some unlawful activity.

3. Throughout 2016 and 2017, Yu continued to transport and assist others in transporting drug proceeds in the United States. During this period, Yu was, at times, acting at the direction of Jianxing Chen (J.Chen), who was arranging the transportation and laundering of drug proceeds on behalf of Li.

4. In addition to Yu, J.Chen employed several couriers whose job was to conduct money pickups in the United States of funds owed to foreign DTOs.

5. One such courier was an individual hereafter known as cooperating source-1 (CS-1). Throughout 2016, CS-1 picked up money derived from the unlawful sale of cocaine in or around Virginia Beach, Virginia, located within the Eastern District of Virginia. During this same period, CS-1 traveled through the Eastern District of Virginia to obtain and transport drug proceeds.

6. The acts described above were done willfully and knowingly and with the specific intent to violate the law, and not by accident, mistake, inadvertence, or other innocent reason. This statement of fact does not contain every fact known to the defendant and to the United States,

and it is not intended to be a full enumeration of all the facts surrounding the defendant's charges.

7. The defendant waives any rights that the defendant may have under Fed. R. Civ. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the Statement of Facts in any proceeding.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

Date: 6/16/21

By: 

David A. Peters
Michael P. Ben'Ary
Assistant United States Attorneys
Eastern District of Virginia
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Tel.: (703)-299-3700

Deborah Connor
Chief, Money Laundering and Asset Recovery
Section, U.S. Department of Justice, Criminal
Division



Kerry Blackburn
Mary Daly
Trial Attorneys

Defendant's Stipulation and Signature

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that if the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 06-16-21

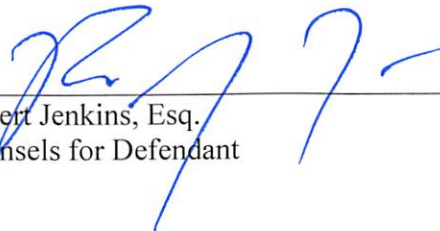


Eric Yong Woo,
Defendant

Defense Counsel's Signature

I am the attorney for Defendant in this case, Eric Yong Woo. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is informed and voluntary.

Date: 6-16-21



Robert Jenkins, Esq.
Counsels for Defendant



10-21-20



10-21-20